INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

February 26, 2004

TO: Interested Parties / Applicant

RE: Great Dane Trailers, Inc. / T021-7731-00008

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

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www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Great Dane Trailers
2664 U.S. Highway 40 East
Brazil, Indiana 47834

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T021-7731-00008	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 26, 2004 Expiration Date: February 26, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3,and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a freight trailer manufacturing operation.

Responsible Official:	John Flathman
Source Address:	2664 U.S. Highway 40 East, Brazil, Indiana 47834
Mailing Address:	P.O. Box 350, Brazil, Indiana 47834
General Source Phone Number:	(812) 443-4711
SIC Code:	3715
County Location:	Clay
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This freight trailer manufacturing company consists of two (2) plants:

(a) Plant 1, the Main Plant, is located at 2664 U.S. Highway 40 East, Brazil, Indiana; and

(b) Plant 2, the Thermacube/Duratemp Plant, is also located on U.S. Highway 40 East, Brazil, Indiana.

Since the two (2) plants are located on contiguous properties, belong to the same industrial grouping, and operate under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) General Fabrication Booth - One (1) paint booth with two (2) compartments equipped with airless and air assisted airless spray guns capable of a maximum coating delivery rate of 16.25 gallons per hour used to paint metal trailer frame parts. This booth was originally constructed in 1974 and its two (2) compartments have dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 1a and 1b.

(b) Fifth Wheel Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.75 gallons per hour used to paint fifth wheel assemblies. This booth was originally constructed in 1974 and has dry filters for particulate overspray control exhausting through Stack 2.

(c) Reefer Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 7.25 gallons per hour used to paint the underbody of refrigerator trailers. For trailers with stainless steel underbody parts, the booth is used for

abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1978 and has dry filters for particulate overspray control exhausting through Stack 3.

(d) Reefer Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 3.75 gallons per hour used to paint undercarriages for the two (2) refrigerator trailer lines. This booth was originally constructed in 1978 and has dry filters for particulate overspray control exhausting through Stack 4. The Reefer Bogie Booth is also used for Reefer Bogie Touchup operations.

(e) Paint Spray Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 1.75 gallons per hour used for specialty coating of trailers. This booth was originally constructed in 1978 and has dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 5a and 5b.

(f) Dry Freight Bogie Line Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.00 gallons per hour used to paint undercarriages for the two (2) dry freight trailer lines. This booth was originally constructed in 1974 and has dry filters for particulate overspray control exhausting through Stack 6.

(g) Dry Freight Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 20.5 gallons per hour used to paint the underbody of dry freight trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 40 lb/hr. This booth was originally constructed in 1974 and has dry filters for particulate overspray control exhausting through Stack 7. The Dry Freight Undercoat Booth is also used for Dry Freight Stall activities which consist of final detailing and/or touch-up of the trailers.

(h) LOL Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 3.50 gallons per hour used to paint the undercarriages for the large order line trailers. This booth was originally constructed in 1984 and has dry filters for particulate overspray control exhausting through Stack 8.

(i) LOL Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 12.0 gallons per hour used to paint the underbody of large order line trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1984 and has dry filters for particulate overspray control exhausting through Stack 9.

(j) MPL Undercoat/Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 8.25 gallons per hour used to paint the underbody and associated components, sometimes including undercarriages, of the trailers assembled on the multipurpose line. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1993, modified in 1997, and has dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 10a and 10b.

(k) Duratemp Spray Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.00 gallons per hour used to paint extrusions and components of Duratemp floor panels. This booth was originally constructed in 1994 and has dry filters for particulate overspray control exhausting through Stack 11.

(l) Welding Operations - The following welding activities are part of the trailer manufacturing

processes:

(a) fifteen (15) oxy-acetylene stick welders
(b) two (2) submerged arc welding (SAW) units
(c) one hundred sixty-two (162) gas metal arc welding (GMAW) units

(m) One (1) shotblaster with a maximum throughput capacity of 2177 pounds of steel parts per hour and a fabric filter for particulate matter control exhausting inside the plant building.

(n) One (1) intake air heater associated with the MPL Undercoat/Bogie Booth having a maximum capacity to combust natural gas, or LPG as a backup fuel, of 21.56 million British thermal unit (MMBtu) per hour.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment. [40 CFR Part 52, Subpart P; covered under C.1]

(b) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3; covered under C.1]

(c) The following activities whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):

(1) One (1) Paint bake off oven equipped with natural gas fired primary and secondary burners rated at 0.625 million British thermal units per hour, each, with a maximum throughput capacity of 50 pounds of paint per hour and a 0.625 million British thermal units per hour natural gas fired thermal oxidizer for control. [326 IAC 4-2]

(2) One (1) Hammermill with a maximum capacity of 2500 pounds of scrap wood per hour. [326 IAC 6-3]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may

invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The

requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do

require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) General Fabrication Booth - One (1) paint booth with two (2) compartments equipped with airless and air assisted airless spray guns capable of a maximum coating delivery rate of 16.25 gallons per hour used to paint metal trailer parts. This booth was originally constructed in 1974 and its two (2) compartments have dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 1a and 1b.

(b) Fifth Wheel Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.75 gallons per hour used to paint fifth wheel assemblies. This booth was originally constructed in 1974 and has dry filters for particulate overspray control exhausting through Stack 2.

(c) Reefer Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 7.25 gallons per hour used to paint the underbody of refrigerator trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1978 and has dry filters for particulate overspray control exhausting through Stack 3.

(d) Reefer Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 3.75 gallons per hour used to paint undercarriages for the two (2) refrigerator trailer lines. This booth was originally constructed in 1978 and has dry filters for particulate overspray control exhausting through Stack 4. The Reefer Bogie Booth is also used for Reefer Bogie Touchup operations.

(e) Paint Spray Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 1.75 gallons per hour used for specialty coating of trailers. This booth was originally constructed in 1978 and has dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 5a and 5b.

(f) Dry Freight Bogie Line Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.00 gallons per hour used to paint undercarriages for the two (2) dry freight trailer lines. This booth was originally constructed in 1974 and has dry filters for particulate overspray control exhausting through Stack 6.

(g) Dry Freight Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 20.5 gallons per hour used to paint the underbody of dry freight trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 40 lb/hr. This booth was originally constructed in 1974 and has dry filters for particulate overspray control exhausting through Stack 7. The Dry Freight Undercoat Booth is also used for Dry Freight Stall activities which consist of final detailing and/or touch-up of the trailers.

(h) LOL Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 3.50 gallons per hour used to paint the undercarriages for the large order line trailers. This booth was originally constructed in 1984 and has dry filters for particulate overspray control exhausting through Stack 8.

(i) LOL Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 12.0 gallons per hour used to paint the underbody of large order line trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1984 and has dry filters for particulate overspray control exhausting through Stack 9.

Facility Description [326 IAC 2-7-5(15)] (cont.):

(j) MPL Undercoat/Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 8.25 gallons per hour used to paint the underbody and associated components, sometimes including undercarriages, of the trailers assembled on the multipurpose line. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1993, modified in 1997, and has dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 10a and 10b.

(k) Duratemp Spray Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.00 gallons per hour used to paint extrusions and components of Duratemp floor panels. This booth was originally constructed in 1994 and has dry filters for particulate overspray control exhausting through Stack 11.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

The following facilities combined shall use less than 249 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month:

General Fabrication Booth;
Fifth Wheel Booth;
Reefer Undercoat Booth;
Reefer Bogie Booth;
Paint Spray Booth;
Dry Freight Bogie Booth;
Dry Freight Undercoat Booth;
Large Order Line (LOL) Bogie Booth;
Large Order Line (LOL) Undercoat Booth;
Multipurpose Line (MPL) Undercoat/Bogie Booth; and
Duratemp Spray Booth.

This usage limit is required to limit the combined potential to emit VOCs from these booths to less than 249 tons per 12 consecutive month period. Compliance with this limit, makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to these facilities.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the:

Large Order Line (LOL) Bogie Booth;
Large Order Line (LOL) Undercoat Booth;
Multipurpose Line (MPL) Booth; and
Duratemp Spray Booth

in excess of four and three-tenths (4.3) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for clear coats, and three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for all other coatings (based on those coatings being air dried or forced warm air dried).

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the:

Large Order Line (LOL) Bogie and Undercoat Booths;
Multipurpose Line (MPL) Booth; and
Duratemp Spray Booth

during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to Permit 11-10-91-0051, CP 021-2693-00008, and/or 40 CFR 52 Subpart P, the particulate matter from the:

General Fabrication Booth;
Fifth Wheel Booth;
Reefer Undercoat Booth;
Reefer Bogie Booth;
Paint Spray Booth;
Dry Freight Bogie Booth;
Dry Freight Undercoat Booth;
Large Order Line (LOL) Bogie Booth;
Large Order Line (LOL) Undercoat Booth;
Multipurpose Line (MPL) Undercoat/Bogie Booth; and
Duratemp Spray Booth

shall individually not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to Permit 11-10-91-0051, CP 021-2693-00008, and/or 326 IAC 6-3-2(d), particulate from the:

General Fabrication Booth;
Fifth Wheel Booth;
Reefer Undercoat Booth;
Reefer Bogie Booth;
Paint Spray Booth;
Dry Freight Bogie Booth;
Dry Freight Undercoat Booth;
Large Order Line (LOL) Bogie Booth;
Large Order Line (LOL) Undercoat Booth;
Multipurpose Line (MPL) Undercoat/Bogie Booth; and
Duratemp Spray Booth

shall be controlled by a dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

D.1.7 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.8 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] [326 IAC 20]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;
(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

Compliance Determination Requirements

D.1.9 Particulate Control - Abrasive Blasting

In order to comply with Condition C.1, the dry filters for particulate control shall be in operation and control emissions from the:

Reefer Undercoat Booth;
Dry Freight Undercoat Booth;
Large Order Line (LOL) Undercoat Booth; and
Multipurpose Line (MPL) Undercoat/Bogie Booth

at all times that the respective abrasive blasters are in operation.

D.1.10 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

D.1.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined separately for each booth by the following equation:

A = [? © x U) / ? U]

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks 1a & b, 2, 3, 4, 5a & b, 6, 7, 8, 9, 10a & b, and 11while the respective booth(s) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below for the:

General Fabrication Booth;
Fifth Wheel Booth;
Reefer Undercoat Booth;
Reefer Bogie Booth;
Paint Spray Booth;
Dry Freight Bogie Booth; and
Dry Freight Undercoat Booth.

Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance for these booths with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used in each booth on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage in each booth for each month;

(4) The combined total VOC usage for each month; and

(5) The combined weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below for the:

Large Order Line (LOL) Bogie Booth;
Large Order Line (LOL) Undercoat Booth;
Multipurpose Line (MPL) Undercoat/Bogie Booth; and
Duratemp Spray Booth.

Records maintained for (1) through (6) shall be taken daily or monthly, as prescribed, and shall be complete and sufficient to establish compliance with the VOC content limits, the VOC usage limit and/or the VOC emission limit established in Conditions D.1.1 and D.1.2 for these booths. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used less water in each booth on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used in each booth for each day;

(4) The cleanup solvent usage in each booth for each month;

(5) The combined total VOC usage for each month; and

(6) The combined weight of VOCs emitted for each compliance period.

(c) To document compliance with Condition D.1.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Notification Requirements [40 CFR 63.3910][326 IAC 20]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.1.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(l) Welding Operations - The following welding activities are part of the trailer manufacturing processes:

(a) fifteen (15) oxy-acetylene stick welders
(b) two (2) submerged arc welding (SAW) units
(c) one hundred sixty-two (162) gas metal arc welding (GMAW) units

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding operations shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the welding operations and any control devices.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.3 Record Keeping Requirements

To document compliance with Condition D.2.2, the Permittee shall maintain records of any inspections prescribed by the Preventive Maintenance Plan.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(m) One (1) shotblaster with a maximum throughput capacity of 2177 pounds of steel parts per hour and a fabric filter for particulate matter control exhausting inside the plant building.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster shall not exceed 4.34 pounds per hour when operating at a process weight rate of 2177 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Particulate Control

To comply with condition D.3.1, the fabric filter for particulate control shall be in operation and control emissions from the shotblaster at all times that the shotblaster is in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

To document compliance with Condition D.3.2, the Permittee shall maintain records of any inspections prescribed by the Preventive Maintenance Plan.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) Paint bake off oven equipped with natural gas fired primary and secondary burners rated at 0.625 million British thermal units per hour, each, with a maximum throughput capacity of 50 pounds of paint per hour and a 0.625 million British thermal units per hour natural gas fired thermal oxidizer for control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Incinerators [326 IAC 4-2]

Pursuant to 326 IAC 4-2-2, the paint bake off oven shall:

(1) consist of primary and secondary chambers or the equivalent;
(2) be equipped with a primary burner unless burning wood products;
(3) comply with 326 IAC 5-1 and 326 IAC 2;
(4) be maintained properly as specified by the manufacturer and approved by the commissioner;
(5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
(6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
(7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gasses, or noxious odors are prevented;
(8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
(9) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) Hammermill with a maximum capacity of 2500 pounds of scrap wood per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.2 Particulate Control

To comply with condition D.5.1, the fabric filter for particulate control shall be in operation and control emissions from the shotblaster at all times that the shotblaster is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Great Dane Trailers
Source Address: 2664 U.S. Highway 40 East, Brazil, Indiana 47834
Mailing Address: P.O. Box 350, Brazil, Indiana 47834
Part 70 Permit No.: T021-7731-00008

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Great Dane Trailers
Source Address: 2664 U.S. Highway 40 East, Brazil, Indiana 47834
Mailing Address: P.O. Box 350, Brazil, Indiana 47834
Part 70 Permit No.: T021-7731-00008

This form consists of 2 pages **Page 1 of 2**

? This is an emergency as defined in 326 IAC 2-7-1(12)
- ? The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ? The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Great Dane Trailers
Source Address: 2664 U.S. Highway 40 East, Brazil, Indiana 47834
Mailing Address: P.O. Box 350, Brazil, Indiana 47834
Part 70 Permit No.: T021-7731-00008
Facility: General Fabrication, Fifth Wheel, Reefer Undercoat, Reefer Bogie, Paint Spray, Dry Freight Bogie, Dry Freight Undercoat, Large Order Line (LOL) Bogie, Large Order Line (LOL) Undercoat, Multipurpose Line (MPL) Undercoat/Bogie, and Duratemp Spray Booths.
Parameter: Volatile Organic Compounds (VOC)
Limit: combined shall use less than 249 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period

YEAR: _____

MONTH 1:

Emission Unit	**VOC Usage this month (tons)**	**Combined Usage this month (tons)**	**Combined Usage previous 11 months (tons)**	**12 Month Total VOC Usage (tons) [this month + previous 11]**
General Fabrication				
Fifth Wheel				
Reefer Undercoat				
Reefer Bogie				
Paint Spray				
Dry Freight Bogie				
Dry Freight Undercoat				
LOL Bogie				
LOL Undercoat				
MPL Undercoat/Bogie				
Duratemp Spray				

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

MONTH 2:

Emission Unit	VOC Usage this month (tons)	Combined Usage this month (tons)	Combined Usage previous 11 months (tons)	12 Month Total VOC Usage (tons) [this month + previous 11]
General Fabrication				
Fifth Wheel				
Reefer Undercoat				
Reefer Bogie				
Paint Spray				
Dry Freight Bogie				
Dry Freight Undercoat				
LOL Bogie				
LOL Undercoat				
MPL Undercoat/Bogie				
Duratemp Spray				

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

MONTH 3:_____

Emission Unit	VOC Usage this month (tons)	Combined Usage this month (tons)	Combined Usage previous 11 months (tons)	12 Month Total VOC Usage (tons) [this month + previous 11]
General Fabrication				
Fifth Wheel				
Reefer Undercoat				
Reefer Bogie				
Paint Spray				
Dry Freight Bogie				
Dry Freight Undercoat				
LOL Bogie				
LOL Undercoat				
MPL Undercoat/Bogie				
Duratemp Spray				

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Great Dane Trailers
Source Address: 2664 U.S. Highway 40 East, Brazil, Indiana 47834
Mailing Address: P.O. Box 350, Brazil, Indiana 47834
Part 70 Permit No.: T021-7731-00008

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit Renewal

Source Name:	Great Dane Trailers, Inc.
Source Location:	2664 U.S. Highway 40 East, Brazil, Indiana 47834
County:	Clay
SIC Code:	3715
Operation Permit No.:	T021-7731-00008
Permit Reviewer:	Chrystal Wagner

On November 12, 2003, the Office of Air Quality (OAQ) had a notice published in the Brazil Times, Brazil, Indiana, stating that J.M. Hutton and Co., Inc. had applied for a Part 70 Operating Permit for a freight trailer manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 2, 2003, Tim Pittman, Plant Engineering Manager, Great Dane Trailers, Inc., submitted comments on the proposed Part 70 permit.

Upon further review, OAQ has made the following revisions to the permit (**bolded** language has been added, ~~struck~~ language has been deleted). The Table of Contents has been modified to reflect these changes.

TSD:

Comment 1:
TSD Enforcement Issue (a), Unpermitted Emission Units, and State Rule Applicability - Duratemp Floor: Does the PTE data submitted in the Title V application contradict the registration data submitted in 1994 (021-4045-00008)?

The question on this is whether the PTE data submitted in the Title V application contradicts the registration data submitted in 1994 (021-4045-00008). Great Dane believes both submittals are correct and do not conflict because of the purpose of the data. It must be noted and stressed that the Title V application information is not data per se, but a theoretical calculation required by statute that has nothing to do with reality.

The registration data were based on actual coating compositions, usage rates, and operating hours for this booth. However, Title V permit applications require us to use a conservative “worst case theoretical scenario” for determining PTE in each booth or emissions point. Specifically, the PTE developed was based on operating the booth 24/7/365 with a 3.5 #/gallon VOC sprayed coating or adhesive. The 3.5 #/gallon value was used solely because it is the legal limit for coating and has no relationship to the process. This is addressed in Note #8 of Table 1 in the application. This IMAGINARY PTE scenario would not have been used or required if the registration and its provisions were federally enforceable. The unit’s IDEM registration and its associated limits are not federally enforceable. Although the PTE of 59.3 TPY is theoretically true if a 3.5 lb VOC/gallon coating was to be used in this booth for 8760 hours per year, no such coating has ever been employed or proposed for it and no actual operations have ever exceeded the

registration limits. In addition, no 3.5#/gallon adhesive was ever considered for use in this application. It is unknown whether such a high solvent content adhesive material that is suitable for the Duratemp floors process actually exists.

Based on Great Dane's understanding of the requirements for data submitted between the registration and the Title V permit application, the possible enforcement issue does not pass muster in this situation.

Comment 2:
TSD Enforcement Issue (b), Unpermitted Emission Units, and State Rule Applicability – MPL/Fifth Wheel/General Fabrication Booths: Great Dane is concerned with IDEM's assertion that the transition from building containers to dry freight vans at the container/MPL line may have increased potential emissions to trigger PSD for the project. The initial MPL/Container permit (CP 021-2693-0008) evaluated the plant for PSD applicability. As a result, Great Dane agreed to reduce emissions in several booths to offset emissions increases from the General Fabrication booth and the MPL booth. In 1994 the demand for dry van containers decreased drastically and was replaced by fleet dry freight vans. At that point conversion of the MPL began to accommodate dry freight vans in lieu of containers. Great Dane agrees that discussion and evaluation should have been held with IDEM on this item, and we have no data to support that any such conversations were held.

However, there is much evidence to show that no emissions increases occurred, and in fact, emissions DECREASED as a result of this change. Discussion with IDEM on this very matter in 2003 is reflected in the State Rule Applicability section: "…there probably not a significant change in total emissions for the project." A logical evaluation of the change in the assemblies coated concurs with this statement. The containers had four frame assemblies and one tunnel assembly. Dry Freight van trailers have one frame assembly and a fifth wheel assembly similar in size and coating requirements to one of the four frame assemblies and the tunnel assembly on the container. The general fab booth emissions were reduced significantly by the elimination of three frame assemblies and the tunnel assembly, and the Fifth Wheel booth emissions increased by a smaller amount due to the transfer of the fifth wheel painting. This change clearly reduced emissions from the facility and as a result would not have triggered PSD review for this change.

Response to Comments 1 and 2:
This facility was granted a Registration in 1994 based on reported potential emissions less than 25 tons per year. Based on potential to emit calculations as defined in 326 IAC 2-7-1(29), the volatile organic compounds (VOCs) reported for this facility in the Title V application are greater than 25 tons per year. Therefore, this facility should have received a Construction Permit rather than the Registration it was issued. Additionally, the reported potential to emit is greater than the PSD minor modification threshold of 40 tons per year which would have been used to determine PSD applicability and, thus, the facility should have either gone through PSD review or been required to limit emissions to less than 40 tons per year to avoid PSD applicability. Based on information presented by Great Dane, this facility has never operated near its maximum potential and, therefore, has never emitted VOCs near the PSD applicability threshold. To correct this issue, the Title V Permit will include the requested 249 ton per year plant wide emissions cap. In regards to possible enforcement action, this will be determined by the Office of Enforcement.

On April 2, 2003, a corrected flow diagram was submitted by Great Dane Trailers. Based on the most current flow diagram and discussions with Great Dane Trailers, product changes were made in March of 1994 subsequent to the original construction permit for the MPL. The container type trailers which were being produced on the MPL were replaced with trailers that incorporated fifth wheel assemblies (container trailers did not have fifth wheel assemblies). This product change would have potentially increased the emissions from the Fifth Wheel Booth because it was previously not utilized in creating the MPL product. The utilization of the Fifth Wheel Booth was not contemplated in the original MPL permit and should have

been included in the PSD applicability analysis for the MPL. At a minimum, a permit action should have occurred at the time to establish additional PSD minor limits and ensure that the requirements of PSD would not apply to the project. To rectify the situation, these previous emission limits will be replaced in the Title V Permit with the requested 249 ton per year plant-wide emissions cap. In regards to possible enforcement action, this will be determined by the Office of Enforcement.

Section B:

Comment 3:
Clarification of Wording – Emergency Provisions (B.11): We request the following changes be made due to their vagueness and being open to broad interpretation:

a) B.11(b)(2): Substitute "properly operated" with "in accordance with the applicable generally accepted standards of good operating practice."

b) B.11(b)(4): Substitute "reasonably should have been discovered" with "… after the emergency was discovered. The four hour notification requirement is triggered at the time when, employing standard good operating practice, the emergency should have been discovered."

c) B.11(b)(6): Substitute "all reasonable steps" with "all steps consistent with pre-approved procedures and applicable generally acceptable standards of good operating practice."

d) B.11(g): Substitute "reasonable steps" with "steps consistent with all applicable generally accepted standards of good operating practice."

e) B.11(g): Substitute "minimize emissions" with "minimize emissions consistent with all applicable generally accepted standards of good reporting practice during the emergency."

Response to Comment 3:
The language found in Condition B.11 was taken directly from 326 IAC 2-7-16. No changes to the final permit were made as a result of these comments.

Comment 4:
Clarification – Operational Flexibility (B.19) and TSD Miscellaneous Issues (Flow Diagram): Due to current limits on LOL/MPL emissions, Great Dane has refused orders for additional painting that could (1) exceed the stated total annual emission limits for those booths or (2) require process line adaptations that would compromise the general validity of the PSD analyses as reflected in the general sequence of production steps listed in our process diagram.

Based upon understanding the regulations and upon previous statements by IDEM, Great Dane is under the impression that the proposed permit would allow the movement of painting operations from booth to booth as long as we comply with the facility-wide emission limit of D.1.1 and the VOC content limits of D.1.2. Great Dane is under the impression that no submittals would be required unless a mechanical change was implemented in the process equipment (such as the purchase of different spray guns, even though the new guns did not impact emissions).

Great Dane raises this issue for clarification because we have occasional orders that may be only 100 trailers or fewer. If such a small order needs a nonstandard process line, the paperwork would theoretically be the same as if we had changed the process for 5000 units. This would be especially frustrating because any emission impacts would be negligible and fully covered by our permit limits.

Also, please indicate any circumstances for which a flow diagram showing a change in process would be required for submittal.

Response to Comment 4:
The plant-wide limit in Condition D.1.1 provides more flexibility for the Permittee than the previous permit conditions that limited emissions for each unit. Operational changes that comply with Condition B.19 do not require that a flow diagram be submitted. However, there are specific notification requirements under this condition pursuant to 326 IAC 2-7-20.

The intent of Condition B.19(a) is to specify when prior permit revisions are not required. 326 IAC 2-7-20(a)(2) specifies that any change that does not result in emissions which exceed the emissions allowable under the permit will not need a prior permit revision, provided that the other requirements of 326 IAC 2-7-20 are satisfied. Condition B.19(a)(2) indicates that approvals required by 326 IAC 2-7-10.5 must be obtained. Approvals are only required by 326 IAC 2-7-10.5 for modifications to existing sources when the potential to emit any regulated pollutant is equal to or exceeds amounts specified by 326 IAC 2. Therefore, approvals are required only when there is an increase in the potential to emit and the requirement of Condition B.19(a)(2) is consistent with 326 IAC 2-7-20 and 326 IAC 2-7-10.5.

Section D

Comment 5:
Clarification of Wording – PSD Minor Limit (D.1.1): Great Dane requests the wording in the first sentence to be changed from "…shall use less than 249 tons of VOC" to "…shall emit less than 249 tons of VOC." This is critical for use of solvent recycling programs. IDEM's current language provides no credit for solvent recycling. This modification is actually necessary, since the laws are based upon emissions to the atmosphere, not usage.

Comment 6:
Clarification – Record Keeping Requirements (D.1.13(a)(2)(B) and (b)(2)(B)): This indicates that records must be kept of solvent usage, differentiating between "cleanup solvents" and those added to coatings. Please clarify the definition and differentiation between such solvents, including which ones must be included in the emissions reported from individual paint booths each month. We suggest the introduction of the term "net usage", which would be defined as the solvent gallons deployed during the month to the plant **minus** the solvent gallons recycled and/or reacted without emission during the month. Emissions from clean up solvents should be negligible, since they are directed into closed containers for proper recycling/disposal.

Also, if solvents are non-HAP, non-photochemically reactive, non-VOC (i.e., acetone), please clarify whether and how they must be reported.

Response to Comments 5 and 6:
The source-wide VOC input is limited, as stated in Condition D.1.1, to limit the potential VOC emissions so that PSD is not applicable. PSD rules and Alabama Power court case require that limits be specified in terms of readily available and measurable terms, such as input. To determine continuous compliance, an input limit is feasible for this type of operation.

Recycled solvents may be factored into the limit, provided that records are kept. Since solvent recovery and recycling are not currently being used at the facility, OAQ will address this issue at a later date.

In order to comply with the limits in Conditions D.1.1 and D.1.2, it is necessary to keep records of the VOC content of all coatings, dilution solvents, and cleaning solvents. Pursuant to 326 IAC 1-2-72, a solvent is

defined as an organic material that is a liquid used as a dissolver, viscosity reducer, or cleaning agent. Therefore, records must be kept for any solvent containing VOC. Pursuant to 326 IAC 1-2-48(a), a nonphotochemically reactive hydrocarbon or negligibly photochemically reactive compound is excluded from the definition of VOC in 40 CFR 51.100(s)(1). Further, 326 IAC 1-2-48(b) states that compliance calculations for coatings expressed as pounds VOC/gallon coating (less water) should treat nonphotochemically reactive compounds or negligibly photochemically reactive compounds as water for purposes of calculating the less water portion of the coating composition.

Comment 7:
Clarification – Emissions Limits for VOC (D.1.2): Great Dane understands that clear reading of this provision indicates that the emissions limits of 4.3 #/gallon VOC for clear coats and 3.5 #/gallon VOC for all other coatings are in effect exclusively for the LOL, MPL and Duratemp booths, but not the grandfathered booths in the facility.

Response to Comment 7:
OAQ agrees. Condition D.1.2 applies only to the four booths identified in that condition: Large Order Line (LOL) Bogie Booth; Large Order Line (LOL) Undercoat Booth; Multipurpose Line (MPL) Booth; and Duratemp Spray Booth.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Great Dane Trailers**
Source Location:	**2664 U.S. Highway 40 East, Brazil, Indiana 47834**
County:	**Clay**
SIC Code:	**3715**
Operation Permit No.:	**T021-7731-00008**
Permit Reviewer:	**Janusz Johnson**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Great Dane Trailers relating to a freight trailer manufacturing operation.

Source Definition

This freight trailer manufacturing company consists of two (2) plants located on U.S. Highway 40, Brazil, Indiana:

(a) Plant 1, the Main Plant, is located at 2664 U.S. Highway 40 East, Brazil, Indiana; and

(b) Plant 2, the Thermacube/Duratemp Plant, is also located on U.S. Highway 40 East, Brazil, Indiana.

Since the two (2) plants are located on contiguous properties, belong to the same industrial grouping, and operate under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) General Fabrication Booth - One (1) paint booth with two (2) compartments equipped with airless and air assisted airless spray guns capable of a maximum coating delivery rate of 16.25 gallons per hour used to paint metal trailer frame parts. This booth was originally constructed in 1974***** and its two (2) compartments have dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 1a and 1b.

(2) Fifth Wheel Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.75 gallons per hour used to paint fifth wheel assemblies. This booth was originally constructed in 1974***** and has dry filters for particulate overspray control exhausting through Stack 2.

(3) Reefer Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 7.25 gallons per hour used to paint the underbody of

refrigerator trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1978***** and has dry filters for particulate control exhausting through Stack 3.

(4) Reefer Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 3.75 gallons per hour used to paint undercarriages for the two (2) refrigerator trailer lines. This booth was originally constructed in 1978***** and has dry filters for particulate overspray control exhausting through Stack 4. The Reefer Bogie Booth is also used for Reefer Bogie Touchup operations.

(5) Paint Spray Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 1.75 gallons per hour used for specialty coating of trailers. This booth was originally constructed in 1978***** and has dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 5a and 5b.

(6) Dry Freight Bogie Line Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.00 gallons per hour used to paint undercarriages for the two (2) dry freight trailer lines. This booth was originally constructed in 1974***** and has dry filters for particulate overspray control exhausting through Stack 6.

(7) Dry Freight Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 20.5 gallons per hour used to paint the underbody of dry freight trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 40 lb/hr. This booth was originally constructed in 1974***** and has dry filters for particulate overspray control exhausting through Stack 7. The Dry Freight Undercoat Booth is also used for Dry Freight Stall activities which consist of final detailing and/or touch-up of the trailers.

(8) LOL Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 3.50 gallons per hour used to paint the undercarriages for the large order line trailers. This booth was originally constructed in 1984 and has dry filters for particulate overspray control exhausting through Stack 8.

(9) LOL Undercoat Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 12.0 gallons per hour used to paint the underbody of large order line trailers. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1984 and has dry filters for particulate overspray control exhausting through Stack 9.

(10) MPL Undercoat/Bogie Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 8.25 gallons per hour used to paint the underbody and associated components, sometimes including undercarriages, of the trailers assembled on the multipurpose line. For trailers with stainless steel underbody parts, the booth is used for abrasive blasting rather than painting with a nominal blast media usage of 20 lb/hr. This booth was originally constructed in 1993, modified in 1997, and has dry filters for particulate overspray control exhausting through two (2) stacks identified as Stacks 10a and 10b.

(11) Duratemp Spray Booth - One (1) paint booth equipped with airless spray guns capable of a maximum coating delivery rate of 4.00 gallons per hour used to paint extrusions and components of Duratemp floor panels. This booth was originally constructed in 1994 and has dry filters for particulate overspray control exhausting through Stack 11.

(12) Welding Operations - The following welding activities are part of the trailer manufacturing processes:

(a) fifteen (15) oxy-acetylene stick welders
(b) two (2) submerged arc welding (SAW) units
(c) one hundred sixty-two (162) gas metal arc welding (GMAW) units

(13) One (1) shotblaster with a maximum throughput capacity of 2177 pounds of steel parts per hour and a fabric filter for particulate matter control exhausting inside the plant building.

(14) One (1) intake air heater associated with the MPL Undercoat/Bogie Booth having a maximum capacity to combust natural gas, or LPG as a backup fuel, of 21.56 million British thermal unit (MMBtu) per hour.

***** Note: Original construction dates for these booths have been previously reported as "1975" in the Agreed Order dated January 8, 1982, and "1968" in the 1996 and 1998 Title V permit applications. The dates noted in this Technical Support Document and the Title V Permit are based on the current construction dates provided by Great Dane Trailers.

History of Spray Booth I.D.s

As listed in the "Permitted Emission Units and Pollution Control Equipment" section, above, the spray booths at Great Dane have traditionally been described by common names. These common booth names have been the most consistent method of identifying the equipment historically and have been used as the basis for identification in this permit.

Previously, these same spray booths have also been referenced by "Department" and "Activity Numbers" associated with the location and manufacturing activities of the booths at Great Dane. Adding to the potential confusion, the assignment of Emission Unit I.D.s and Stack Vent I.D.s in the two Title V applications submitted was inconsistent. To clarify unit/stack I.D.s and facilitate reference to emission unit information in the Title V applications and previous air permits, the following table outlines the various nomenclature that has been used to identify the spray booths to date:

TV Permit & TSD			**'96 TV App.**		**'98 TV App.**		**Department -**
Booth Name	**Unit I.D.**	**Stack(s)**	Unit I.D.	Stack(s)	Unit I.D.	Stack(s)	**Activity Codes**
General Fabrication Booth	**1**	**1a & 1b**	1	1	1	1 & 2	**75-26 (a.k.a. 75A&B)**
Fifth Wheel Booth	**2**	**2**	2	2	2	3	**75-27**
Reefer Undercoat Booth	**3**	**3**	4	4	3	4	**62-26**
Reefer Bogie Booth	**4**	**4**	3 & 5	3 & 5	4	5	**64-23 & 61-09**
Paint Spray Booth	**5**	**5a & 5b**	6	6	5	6 & 7	**68-67**
Dry Freight Bogie Booth	**6**	**6**	7	7	6	8	**71-23**
Dry Freight Undercoat Booth	**7**	**7**	8 & 9	8 & 9	7	9	**82-26 & 82-32**
LOL Bogie Booth	**8**	**8**	10	10	8	10	**58-23**
LOL Undercoat Booth	**9**	**9**	11	11	9	11	**58-26**

MPL Undercoat/Bogie Booth	**10**	**10a & 10b**	12	12	10	12 & 13	**30-26**
Duratemp Spray Booth	**11**	**11**	13	13	11	14	**22-01**

Unpermitted Emission Units and Pollution Control Equipment

There are no previously unpermitted facilities known to be operating at this source during this review process; however, based on information presented in the Title V permit application some facilities currently operating under permit approvals are incorrectly permitted. In two cases, the information presented in the Title V application indicates that facilities are currently operating without an appropriate permit:

(1) The potential to emit (PTE) volatile organic compounds (VOC) reported for the Duratemp Spray Booth in the Title V application (59.02 tons per year) is greater than previously estimated. This facility was granted a Registration in 1994 based on reported potential emissions less than 25 tons per year. Therefore, this facility should have received a Construction Permit rather than the Registration it was issued. Additionally, the reported potential to emit is greater than the PSD minor modification threshold of 40 tons per year which would have been used to determine PSD applicability and, thus, the facility should have either gone through PSD review or been required to limit emissions to less than 40 tons per year to avoid PSD applicability. This issue is further discussed in the State Rule Applicability section of this TSD (Page 16, 326 IAC 2-2 discussion).

(2) On August 17, 1998, Great Dane Trailers submitted a revised Title V permit application which included a flow diagram of the trailer manufacturing process. On April 2, 2003, a corrected flow diagram was submitted by Great Dane Trailers. Based on the most current flow diagram and discussions with Great Dane Trailers, product changes were made in March of 1994 subsequent to the original construction permit for the MPL. The container type trailers which were being produced on the MPL were replaced with trailers that incorporated fifth wheel assemblies (container trailers did not have fifth wheel assemblies). This product change would have potentially increased the emissions from the Fifth Wheel Booth because it was previously not utilized in creating the MPL product. The utilization of the Fifth Wheel Booth was not contemplated in the original MPL permit and should have been included in the PSD applicability analysis for the MPL. At a minimum, a permit action should have occurred at the time to establish additional PSD minor limits and ensure that the requirements of PSD would not apply to the project. This issue is further discussed in the 'State Rule Applicability - Entire Source' (Page 16, 326 IAC 2-2 discussion) section of this TSD.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(2) Propane or liquified petroleum gas, or butane fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour. [Note: This category has been included to account for HVAC units and/or small area heaters which normally combust natural gas, but have the potential to combust LPG as a backup fuel.]

(3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(4) The following VOC and HAP storage containers:
  (A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  (B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(5) Cleaners and solvents characterized as follows:
  (A) having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38?C (100?F) or
  (B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20?C (68?F);

  The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(6) Degreasing operations that do not exceed 145 gallons per 12 months, not subject to 326 IAC 20-6.

(7) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment. [40 CFR Part 52, Subpart P; covered under C.1]

(8) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(10) Paved and unpaved roads and parking lots with public access.

(11) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(12) On site fire and emergency response training approved by the department.

(13) Stationary fire pumps.

(14) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.[326 IAC 6-3; covered under C.1]

(15) The following activities whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):

  (A) Four (4) 6,000 gallon pressurized HCFC-141B/MDI Resin Mix storage tanks: T1-T4;

  (B) Four (4) 8,200 gallon pressurized HCFC-141B/MDI Resin Mix storage tanks: T5-T8;

  (C) Four (4) 30,000 gallon pressurized liquid propane storage tanks: T9-T12;

  (D) Two (2) 5,000 gallon pressurized liquid propane storage tanks: T13 and T14;

(E) One (1) Paint bake off oven equipped with natural gas fired primary and secondary burners rated at 0.625 million British thermal units per hour, each, with a maximum throughput capacity of 50 pounds of paint per hour and a 0.625 million British thermal units per hour natural gas fired thermal oxidizer for control; [326 IAC 4-2] and

(F) One (1) Hammermill with a maximum capacity of 2500 pounds of scrap wood per hour. [326 IAC 6-3]

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- An Agreed Order effective January 8, 1982, requiring existing facilities operating without an operation permit to be permitted appropriately.

- Operation Permit No. 11-02-86-0042, issued March 30, 1982, for a "truck trailer manufacturing plant [...] consisting of surface coating facilities with particulate matter emissions controlled by water-wash systems and dry filters." [See notes on OP 11-10-91-0051 (below) for discussion of the spray booths presumed to be covered by this permit, OP 11-02-86-0042.]

- A Letter of Registration for the Reinforced Fiberglass Panel Plant, issued on May 9, 1983.

- A Letter of Registration for "facilities producing urethane foam core panels with aluminum skin sheets", issued on October 2, 1984. [The product of this process is currently referred to as Thermacube Panels.]

- A Letter of Registration for two (2) new paint booths with overspray controlled with dry filters, issued on November 2, 1984. [These facilities are currently known as the Large Order Line (LOL) Bogie and Undercoat Booths. This registration was later superceded by OP 11-10-91-0049 as a result of an Agreed Order (Cause A-671).]

- An Agreed Order (Cause A-671) effective April 7, 1988, applicable to the LOL lines and requiring appropriate permitting for these facilities based on 1985 VOC emissions.

- Operation Permit No. 11-10-91-0049, issued March 21, 1988, for "two (2) new Large Order Line spray booths, LOL No. 1 and No. 2." [These facilities are currently known as the Large Order Line Bogie and Undercoat Booths. This permit superceded the Registration dated November 2, 1984.]

- An Amendment Letter issued on October 17, 1988, revising OP 11-10-91-0049.

- Operation Permit No. 11-10-91-0051, issued on April 26, 1989, for "eight (8) "existing" surface coating booths with particulate emissions controlled by water wash systems or filters." [It is assumed, although not specifically stated in the document, that this permit replaced, and covered the same equipment as, OP No. 11-02-86-0042. The eight (8) booths referenced are presumed to be the General Fabrication, Fifth Wheel, Dry Freight Undercoat, Dry Freight Bogie, Reefer Undercoat, Reefer Bogie, and Paint Spray Booths based on the Title V applications and supplemental information provided by Great Dane Trailers. The General Fabrication Booth was likely counted as 2 booths at the time due to its dual compartments (a.k.a. 75A&B), thus totaling 8 booths.]

- Construction Permit No. 021-2693-00008, issued on February 2, 1993, for a container assembly line, including a new spray paint booth (No. 30), expanded use of two existing booths (No. 75A or B and 64A), and a natural gas fired 21.56 MMBtu/hr intake air heater. [The container assembly line booth (No. 30) and the two existing booths (75A/B and 64A) referenced are currently known as the MPL Undercoat/Bogie Booth and the General Fabrication Booth and the Reefer Bogie Booth, respectively.]

- A Letter of Registration (No. 021-4045-00008), issued September 19, 1994, for one (1) Duratemp Floor Process Surface Coating Booth with a capacity of 2.5 trailer floors per hour and one (1) natural gas curing oven (0.6 MMBtu/hr).

- An Exemption Letter (No. 021-4239-00008), issued January 4, 1995, for one (1) hammermill with a capacity of 2500 pounds of scrap/secondary wood per hour.

- An Exemption Letter (No. 021-5249-00008), issued February 19, 1996, for one (1) paint

bake off oven with a capacity of 50 pounds of paint per hour with primary and secondary burners fired by natural gas with heat input capacities of 0.625 MMBtu/hr, each, and connected to a natural gas fired thermal oxidizer with a heat input capacity of 0.625 MMBtu/hr.

- An Agreed Order (Cause A-3247) effective October 16, 1996, related to exceedances of the limiting condition No. 4C of Operation Permit No. 11-10-91-0049 based on June 8, 1995 records review of paint usage in the Large Order Line Booths.

- An Exemption Letter (No. 021-8887-00008), issued September 24, 1997, for a dedicated wheel assembly painting area added to existing spray booth no. 30. [Spray booth no. 30 is currently known as the MPL Undercoat/Bogie Booth. This exemption also contained provisions adding operation conditions to the existing CP 021-2693 which accounted for the addition made to that existing spray booth.]

- An Agreed Order (Case No. 2000-10073-A) effective June 14, 2002, related to exceedances of the coating content limits applied to metal parts painted in the MPL and LOL booths in permits Nos. 11-10-91-0049 and 021-2693-00008 and 326 IAC 8-2-9 based on reports submitted for the 3rd and 4th Quarters of 2000 and the 1st Quarter of 2001.

All operating conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) OP 11-02-86-0042, issued March 30, 1982

Condition 1: That the equipment shall be operated and maintained in accordance with the manufacturer's specifications.

This condition language has not been incorporated into the Part 70 permit directly because it is currently assumed that equipment is operated and maintained in accordance with manufacturer's specifications without explicitly requiring it in a permit condition. Additionally, more specific operational requirements for the equipment previously covered by this permit will be added to the Part 70 permit as compliance monitoring and response provisions (if determined to be necessary) to ensure that the equipment is operated in an appropriate manner.

(2) Agreed Order (Cause A-671) effective April 7, 1988

Condition II.4: Until a federally enforceable PSD permit is issued by the State of Indiana to the Respondent [Great Dane Trailers, Inc.] for its new Large Order Line, the Respondent shall:

a. Comply with all conditions in all permits presently in force.
b. Immediately implement surface coatings operatings [sic.] that comply with 325 IAC 8-2-10(b)(1) so:
1) that the daily weighted average VOC content of all clear coatings used shall not exceed 4.3 pounds per gallon of coating, excluding water, delivered to the applicator.
2) that the daily weighted average VOC content of all other coatings used shall not exceed 4.3 pounds per gallon of coating, excluding water, delivered to the applicator.
c. Immediately limit the quantity of surface coating used, and the solvent content of the coatings, so that the average daily VOC emission calculated on a monthly basis using the actual number of days worked as the denominator shall not exceed 317 pounds per day.

d. Maintain a daily log of information necessary to document compliance with part b.1, b.2 and c of this paragraph.

e. Maintain the daily logs required under part D [sic.] of this paragraph for a minimum of twenty-four (24) months and the logs shall be made available to the Indiana Office of Air Management. A quarterly summary shall be submitted to the Office of Air Management by the end of the month following the quarter being reported.

f. Before making any change in the Large Order Line which may result in VOC emissions exceeding the average daily emission of 317 pounds as calculated in C [sic.] above, obtain approval from the Commissioner.

Condition II.5: On and after the date of issuance of any federally enforceable PSD permit issued by the State of Indiana, if such a permit application should become necessary for the Respondent's new Large Order Line, the Respondent shall comply with all operational and emission limits specified in such permit.

Condition I.4 of the same Agreed Order states that emissions from the LOL lines exceeded the State permitting threshold in 1985 but apparently not the PSD major modification threshold. A PSD permit was not actually required, as anticipated by II.4 and II.5, and an operating permit (OP 11-10-91-0049) was subsequently issued for the LOL lines which established a PSD minor emission limitation (4C of that permit) that was more stringent than the limitation required in II.4c of the Agreed Order. Therefore, these conditions have not been incorporated into the Part 70 permit.

(3) OP 11-10-91-0049, issued on March 21, 1988 AND the Amendment issued on October 17, 1988, revising OP 11-10-91-0049.

Condition 3: That the equipment shall be operated and maintained in accordance with the manufacturer's specifications.

This condition language has not been incorporated into the Part 70 permit directly because it is currently assumed that equipment is operated and maintained in accordance with manufacturer's specifications without explicitly requiring it in a permit condition. Additionally, more specific operational requirements for the equipment previously covered by this permit will be added to the Part 70 permit as compliance monitoring and response provisions (if determined to be necessary) to ensure that the equipment is operated in an appropriate manner.

Condition 4: That the operation of the two (2) new Large Order Line spray booths will be subject to the following conditions:

A. That pursuant to 325 IAC 8-2-10(b)(1), the daily weighted average of all clear coatings used shall not exceed 4.3 pounds per gallon of coating, excluding water, delivered to the applicator.

B. That pursuant to 325 IAC 8-2-10(b)(1), the daily weighted average of all other coatings used shall not exceed 3.5 pounds per gallon of coating, excluding water, delivered to the applicator.

[…]

D. That a log of information necessary to document compliance with Conditions 4A and 4B be maintained. These data shall include the quantities, densities and organic solvent contents of all

coatings used. In addition, an inventory of information necessary to document compliance with Condition 4C be maintained. These records shall be kept for at least the past twenty-four (24) month period and made available upon request of the Office of Air Management. A quarterly summary of the daily averages in pounds of VOC per gallon of coating, excluding water, delivered to the applicator and three individual monthly emission rates shall be submitted by the end of the month following the quarter being reported to:

Plan Review and Permit Section (8)
Office of Air Management
Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

These data shall be submitted in the format of the attached forms.

[…]

The coating content limitations of Condition 4, Items A and B, have been included in the Part 70 permit; however, the basis for the applicability of the content limits has been revised from 325 IAC 8-2-10(b)(1) to 326 IAC 8-2-9 because of a recodification of Indiana's environmental rules that happened since the issuance of this previous permit. The coating content limit reporting requirement of Condition 4, Item D, has not been included in the Part 70 permit because record keeping has been determined to be adequate for demonstrating compliance with coating content limitations. The requirement to keep records for twenty-four (24) months will be revised to be consistent with the standard record keeping time frames of the Part 70 program.

The other items of Condition 4, some of which were revised by the Amendment issued 10/17/88 (and not specifically shown here) related to the 39.6 ton per year PSD minor modification limit applied to the LOL project. These provisions will not be directly included in the Part 70 permit based on a request from Great Dane Trailers to pursue a plantlike emission cap. The emission cap is discussed in the State Rule Applicability section of this TSD.

(4) OP 11-10-91-0051, issued April 26, 1989

Condition 3: That the equipment shall be operated and maintained in accordance with the manufacturer's specifications.

This condition language has not been incorporated into the Part 70 permit directly because it is currently assumed that equipment is operated and maintained in accordance with manufacturer's specifications without explicitly requiring it in a permit condition. Additionally, more specific operational requirements for the equipment previously covered by this permit will be added to the Part 70 permit as compliance monitoring and response provisions (if determined to be necessary) to ensure that the equipment is operated in an appropriate manner.

Condition 4: That particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

a. visibly detectable at the exhaust,
b. accumulated on the rooftops or the ground, or
c. causing any nuisance problems.

This condition language has not been incorporated into the Part 70 permit because revisions have been made to the underlying regulation (326 IAC 6-3) since the issuance of this permit which affect how spray coating operations demonstrate compliance with the applicable requirements. The Part 70 permit will contain appropriate compliance monitoring and response requirements in place of this language consistent with the revised 326 IAC 6-3 rule and the Title V requirements.

(5) CP 021-2693-00008, issued on February 2, 1993

Condition 3: That the equipment shall be operated and maintained in accordance with the manufacturer's specifications.

This condition language has not been incorporated into the Part 70 permit directly because it is currently assumed that equipment is operated and maintained in accordance with manufacturer's specifications without explicitly requiring it in a permit condition. Additionally, more specific operational requirements for the equipment previously covered by this permit will be added to the Part 70 permit as compliance monitoring and response provisions (if determined to be necessary) to ensure that the equipment is operated in an appropriate manner.

Condition 4: That the production of containers through the line containing spray booth 30 shall be limited to 4461 units per year (365 days) rolled on a daily basis.

This condition limited production in Spray Booth 30 (currently known as the MPL Undercoat/Bogie Booth) such that the VOC emissions from the new booth would not exceed 69.6 tons per year. This limited level of emissions was established based on a reduction in emissions from other existing booths (see Condition 5 of this permit, below) such that the net increase in emissions from the project that included the new MPL Undercoat/Bogie Booth would not exceed 39 tons per year and, therefore, would not trigger Prevention of Significant Deterioration (PSD) requirements.

This condition will not be directly included in the Part 70 permit based on a request from Great Dane Trailers to pursue a plantlike emission cap. The emission cap is discussed in the State Rule Applicability section of this TSD.

Condition 5: That the total VOC content of the designated VOC offset coatings in booths 71A, 64A (identified as red oxide primer substitute, nonleafing aluminum substitute), and booths 62A, 82A (Lilly aluminum RPC substitute) shall be limited to 107 tons per year (365 days) rolled on a daily basis. The reduction in VOC emissions associated with these coatings will supply sufficient offset so that the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

This condition limited the emissions from booths 71A, 64A, 62A and 82A (currently known as the Dry Freight Bogie Booth, Reefer Bogie Booth, Reefer Undercoat Booth and Dry Freight Undercoat Booth, respectively) to 107 tons per year to establish a reduction from past actual emissions in those booths of 30.6 tons per year based on the substitution of new, lower VOC, coatings. The emission reduction established by this limit was coupled with the production limitation in the MPL Undercoat/Bogie Booth (Condition 4, above) to establish the net emissions increase for the project of 39 tons per year.

This condition will not be directly included in the Part 70 permit based on a request from Great Dane Trailers to pursue a plantlike emission cap. The emission cap is discussed in the State Rule Applicability section of this TSD.

Unnumbered condition: (top of Page 4 of permit)

(a) visibly detectable at the exhaust,
(b) accumulated on the rooftops or on the ground, or
(c) causing any nuisance problems.

This fragmented language appears to be related to paint booth overspray compliance with the particulate matter requirements of 326 IAC 6-3. It is not clear from the hardcopy of the permit available whether this condition was intended to be Condition 8 or what the rest of the condition language looked like. For the purposes of this Part 70 permit it will be assumed that the condition was intended to be similar to Condition 4 of OP 11-10-91-0051 (outlined in (4), above). This fragmented condition language has not been incorporated into the Part 70 permit based on it being superceded by Condition 9 of Exemption 021-8887-00008 (see (7), below) and revisions made to the underlying regulation, 326 IAC 6-3, since the issuance of this permit. The Part 70 permit will contain appropriate compliance monitoring and response requirements in place of this language consistent with the revised 326 IAC 6-3 rule and the Title V requirements.

(6) Exemption 021-5249-00008, issued February 19, 1996

Condition (a): Pursuant to 326 IAC 2-1, particulate matter (PM) emissions shall not exceed 1.04 pounds per hour and 0.185 pounds per 1000 pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air. This shall also satisfy the requirements of 326 IAC 4-2-2.

This condition generally reflects the language of 326 IAC 4-2-2(8)(A) with the exception of the 1.04 pounds per hour limit and that the 0.3 pound per 1000 pounds of dry exhaust gas limit in the rule was truncated to 0.185 pound per 1000 pounds of dry exhaust gas. The truncated limit is equivalent to the 1.04 pounds per hour limit which, in turn, is reflective of the upper threshold for exempt facilities under State construction permit rules (i.e. less than the registration level of 25 pounds per day outlined in 326 IAC 2-1). The pound per hour limit and truncated 326 IAC 4-2-2 limit will not be carried over into the Part 70 permit because compliance with these short term limits is not necessary to comply with the underlying requirements of 326 IAC 2-1 or 326 IAC 4-2-2. The Part 70 permit will reflect the applicable 326 IAC 4-2-2 limit of 0.3 pound per 1000 pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air. Any physical change or change in the method of operation of the incinerator that could increase its potential to emit is subject to the requirements of 326 IAC 2-7-10.5 (Part 70 permits: source modifications) upon issuance of this Part 70 permit.

(7) Exemption 021-8887-00008, issued September 24, 1997

Condition 9:

(a) The dry filters for particulate matter overspray control shall be in operation at all times when paint booth no. 30 together with the proposed wheel assembly painting area are in operation.

(b) The paint booth no. 30 together with the proposed wheel assembly painting area shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ *where: E = rate of emission in pounds per hour, P = process weight in tons per hour, if P is equal to or less than 60,000 lbs/hr (30*

tons/hr)

(c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the dry filters.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

This condition has not been directly incorporated into the Part 70 permit based on revisions made to the underlying regulation, 326 IAC 6-3, since the issuance of this exemption. The Part 70 permit will contain appropriate limits, compliance monitoring and response requirements in place of this condition consistent with the revised 326 IAC 6-3 rule, 40 CFR 52, Subpart P, and the Title V requirements.

Enforcement Issue

(a) IDEM is aware that the Duratemp Spray Booth has been constructed and operated prior to receipt of the proper permit. The subject equipment is discussed in this Technical Support Document under the section entitled "Unpermitted Emission Units and Pollution Control Equipment" (Page 4) although it is listed as a permitted emission unit since it did previously have a Letter of Registration issued.

(b) IDEM is aware that changes in the method of operation of the Fifth Wheel Booth associated with changes made to the production of units on the MPL in March of 1994 were not appropriately permitted to operate as they do currently and that current operation may be in violation of PSD requirements. The subject equipment is discussed in this Technical Support Document under the section entitled "Unpermitted Emission Units and Pollution Control Equipment" (Page 4) although the facilities are listed as permitted emission units since they had previously been permitted.

(c) IDEM is reviewing these matters and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the applications and additional information submitted by the applicant.

A Part 70 permit application for the purposes of this review was received on December 16, 1996.

A notice of completeness letter was mailed to the source on April 17, 1998.

A revised Part 70 permit application was received on August 17, 1998.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	less than 250
SO_2	less than 25
VOC	greater than 250
CO	less than 25
NO_x	less than 25

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
ethyl benzene	greater than 10
MEK	greater than 10
toluene	greater than 10
xylene	greater than 10
MIK	greater than 10
methanol	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter with an aerodynamic diameter of 10 microns or less (PM-10) and volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	*N.R.*
PM-10	1
SO_2	*N.R.*
VOC	177
CO	*N.R.*
NO_x	*N.R.*
HAP (specify)	*N.R.*

N.R. = not reported

County Attainment Status

The source is located in Clay County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment

Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clay County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Clay County has been classified as attainment or unclassifiable for all other relevant regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

Great Dane Trailers has multiple liquid storage tanks at the plant site. Some of these tanks (T9-T14) were constructed after June 11, 1973 and prior to May 19, 1978, but are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, Subpart K (40 CFR 60.110), because each of these tanks has a storage capacity less than 151,412 liters (40,000 gallons) and they are sealed pressurized tanks designed to operate without emissions to the atmosphere. The other tanks (T1-T8) were constructed after July 23, 1984, but are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, Subpart Kb (40 CFR 60.110b, Subpart Kb) because each tank has a storage capacity less than 75 cubic meters (19,800 gallons) and they are sealed pressurized tanks designed to operate without emissions to the atmosphere.

40 CFR Part 60, Subpart Ce does not apply to the pain burn-off oven since this operation is not a hazardous waste incinerator as defined by 60.30e.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

The degreasing/cleaning operation at Great Dane Trailers is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460), because the conveyorized unit is a phosphate

based parts cleaner and halogenated solvents are not used.

40 CFR Part 63, 261 and 270 do not apply to the paint burn-off oven since this operation is not a hazardous waste combustion process as defined by such rules.

(c) Upon completion of the promulgation process, 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) will be incorporated into this Part 70 permit. Subpart MMMM applies to this major source of Hazardous Air Pollutants (HAP) because it uses 250 gallons or more per year of HAP-containing coatings in the surface coating of miscellaneous metal parts or products. The Permittee shall comply with the following:

(1) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in the Indiana Administrative Code as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified in 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products). The Permittee shall comply with these requirements on and after the effective date of 40 CFR 63, Subpart MMMM.

(2) The affected source is subject to the provisions of 40 CFR 63, Subpart MMMM, effective the date the rule is published in the Federal Register. Pursuant to 40 CFR 63.3883(b), the Permittee shall comply with these requirements on and after the date that is three years after the effective date of the rule.

(3) Pursuant to 40 CFR 63.3910(a), the Permittee shall submit the notifications in §§ 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the Permittee. The Permittee must submit these notification by the dates specified in those sections, except as provided below.

(4) Pursuant to 40 CFR 63.3910(b), the Permittee shall submit the Initial Notification no later than one (1) year after the effective date of 40 CFR 63, Subpart MMMM.

(5) The Permittee shall submit the Notification of Compliance Status required by § 63.9(h) no later than thirty (30) calendar days following the end of the initial compliance period described in §§ 63.3940, 63.3950, or 63.3960 that applies to the affected source. The Notification of Compliance Status must include the information required in § 63.3910(c)(1) through (11) and in § 63.9(h).

(d) 40 CFR 64 Compliance Assurance Monitoring - This source has the following “pollutant-specific emission units” as defined in 40 CFR 64.1:

- General Fabrication Booth
- Dry Freight Undercoat Booth
- Large Order Line Undercoat Booth

(1) These facilities are considered pollutant-specific emission units because they are units:

(A) with the potential to emit before controls equal to or greater than the major source threshold for particulate matter;

(B) that are subject to an emission limitation or standard for particulate matter; and

(C) use a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this modification.

(2) The pollutant-specific emission units are not "large units" as described in 40 CFR 64.5. Therefore, the owner or operator shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

Great Dane Trailers' Brazil Plant has the potential to emit greater than 250 tons per year of volatile organic compounds (VOC) and has, therefore, been a major PSD source. To date, none of the facilities at Great Dane Trailers have been required to go through PSD review because no construction or modification project has triggered PSD applicability; however, during the Title V review of the previous permits and construction projects for this source it was determined that previous analyses of some projects were incomplete in scope. Additionally, there have been changes in some of the product lines over time that should have been permitted prior to commencing modification and operation of the existing equipment. The following discussion revisits the permitting history of this source relevant to the PSD requirements. To resolve these issues, Great Dane Trailers has requested that a 249 ton per year plant wide emission cap be established in the Part 70 permit to ensure that PSD review requirements are not applicable.

Initially this source consisted of the following PSD grand fathered facilities (i.e. emission units constructed prior to the effective date of the PSD regulations in August of 1977): General Fabrication, Fifth Wheel, Dry Freight Undercoat, Dry Freight Bogie, Reefer Undercoat, Reefer Bogie, and Paint Spray Booths. Although potential emissions from these facilities are greater than 250 tons per year, they were not subjected to PSD review because of their grand fathered status.

LOL Project

Great Dane Trailers added two additional paint booths as part of the Large Order Line (LOL) in 1984 under a Registration. Based on an Agreed Order, the LOL booths were subsequently required to get an operation permit in 1988 (No. 11-10-91-0049). Review of the 1988 permit for the LOL Booths indicates that a PSD minor modification limit of 39.6 tons per year was required to avoid PSD applicability. Unfortunately, this PSD analysis failed to consider whether the addition of the LOL booths would have a debottlenecking affect on any of the existing grand fathered facilities. Based on flow diagrams provided by Great Dane Trailers, the General Fabrication and Fifth Wheel Booths would have experienced increased emissions as a result of the addition of the LOL booths because the General Fabrication and Fifth Wheel booths prime coat assembly parts used in the manufacture of trailers on the Large Order Line. The increased emissions from these booths should have been included as part of the project's net emissions increase. The resulting permit should have limited both the LOL booths and the General Fabrication and Fifth Wheel Booths such that the total increase for the project would be less than 40 tons per year and the PSD requirements would not apply.

The PSD minor modification limit of 39.6 tons of volatile organic compounds (VOC) per year established for the Large Order Line in Operation Permit No. 11-10-91-0049 will be replaced in the Title V Permit with the requested 249 ton per year plant wide emissions cap.

MPL Projects

In 1993 Great Dane Trailers added a multipurpose trailer assembly line, designated 'MPL'. This line included a spray booth and, like the LOL addition, had an effect on some of the grand fathered facilities. In this case, the construction permit for the MPL addition (CP021-2693-00008) did

contemplate debottlenecking. Based on information submitted by Great Dane Trailers at the time, the MPL project was defined as including increased use of the General Fabrication Booth and the Reefer Bogie Booth. Discussions with, and additional information from, Great Dane Trailers indicates that this increased use was based on producing container type trailers using frame parts that were prime coated in the General Fabrication Booth, and utilization of the Reefer Bogie Booth during the night shift to paint and install bogies onto the frames of the container trailers completed on the MPL.

Also included in the PSD analysis for this MPL project was a reduction in the emissions from some of the grand fathered paint booths (the Reefer Bogie and Undercoat Booths and the Dry Freight Bogie and Undercoat Booths) used to net some of the project's emission increases such that PSD did not apply. These four 'offset' booths were limited as a result and it is assumed that any potential emission increase experienced by the Reefer Bogie Booth was covered by this limit. Although the General Fabrication Booth was correctly included in the analysis, no apparent limit on this booth's emissions was established to ensure that the increases would not trigger PSD applicability for the project.

Additionally, after the original permitting and startup of the MPL, Great Dane Trailers started to make standard trailers on this line in place of container trailers (March, 1994). The production of these standard trailers required fifth wheel assemblies which the container trailers did not use. This change would have increased the emissions from the Fifth Wheel Booth which, until then, was not used in production of MPL trailers. Had information on this operation scenario been available at the time the permit for the MPL was reviewed, this emissions increase would have been considered as part of the MPL project and would have factored into the PSD applicability analysis for the MPL project. In reality, there was probably not a significant change in total emissions for the project as a result of the switch to standard trailers because the number of tunnel assemblies (a part on the container trailers similar in size and placement to the fifth wheel assembly) primed in the General Fabrication Booth would have been reduced on a one to one basis for each fifth wheel painted in the Fifth Wheel Booth; however, this change in product did create a situation where an emissions limit should have been placed on the Fifth Wheel Booth to ensure PSD was not applicable.

Thus, the permit for the MPL project should have included emission limits on the General Fabrication Booth and the Fifth Wheel Booth in addition to the limits on the MPL booth and the four offset booths which provided emission reductions. To rectify the situation, these previous emission limits will be replaced in the Title V Permit with the requested 249 ton per year plant wide emissions cap.

Another MPL Booth modification to expand its capability and allow for dedicated painting of bogies was classified as Exempt (CP 021-8887-00008) after review of the application for the project submitted by Great Dane on August 19, 1997. This modification to the MPL Booth was evaluated for PSD applicability and, based on the new painting area emissions being incorporated into the existing MPL Booth limit, was found to not have a PSD significant increase. Additional information, including a revised flow diagram, was received from Great Dane Trailers on April 2, 2003. This new information clarified that the general purpose of this MPL modification was to better accommodate standard trailer production on that line. Based on the information provided and the "trailer unit" basis of the original production limit established under the original MPL permit (CP021-2693-00008), it appears that the PSD determination made in the exemption was appropriate for that project. The 249 ton per year plant wide cap established in the Title V Permit will also be consistent with and provide the ability to enforce this determination.

Duratemp Project

Because the potential to emit volatile organic compounds (VOCs) reported for this facility in the Title V application is greater than the PSD minor modification threshold of 40 tons per year, the facility should have either gone through PSD review or been required to limit emissions to less than

40 tons per year to avoid PSD applicability. Based on information presented by Great Dane, this facility has never operated near its maximum potential and, therefore, has never emitted VOCs near the PSD applicability threshold. To correct this issue, the Title V Permit will include the requested 249 ton per year plant wide emissions cap.

Miscellaneous Issue

The revised flow diagram received from Great Dane Trailers on April 2, 2003, clarified that the Paint Spray Booth was not used to coat trailers produced on the MPL or LOL lines as the flow diagram included with the 1998 Title V application appeared to indicate. Based on this information, there are no increased emissions from the Paint Spray Booth associated with the LOL and MPL additions that needed to be considered in the PSD applicability analysis for those two projects.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-4.1(New Source Toxics Control)

The source is not subject to 326 IAC 2-4.1 because the source was constructed prior to July 27, 1997 which is the applicability date of this rule.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the Part 70 permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires the source not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source is not subject to this rule because the source was built prior to the rule applicability date October 7, 1974.

State Rule Applicability - Individual Facilities

326 IAC 4-2 (Incinerators)

Pursuant to 326 IAC 4-2-2, the paint bake off oven shall:

(1) consist of primary and secondary chambers or the equivalent;
(2) be equipped with a primary burner unless burning wood products;
(3) comply with 326 IAC 5-1 and 326 IAC 2;
(4) be maintained properly as specified by the manufacturer and approved by the

commissioner;

(5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gasses, or noxious odors are prevented;

(8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and

(9) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) - Small process operations

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

Specifically, particulate emissions from the abrasive blasting operations conducted in the undercoat booths of the Dry Freight, Refer, Large Order and Multi-Purpose lines shall not exceed 0.551 pounds per hour. The dry filters for these booths must be properly maintained and shall be in place and operating at all times that an abrasive blaster is operated.

326 IAC 6-3 (Process Operations) - Paint Booths

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement(s) from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement(s) until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the paint booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Pursuant to 326 IAC 6-3-2(d), particulate from surface coating operations shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) - Shotblaster

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the shotblaster shall not exceed 4.34 pounds per hour when operating at a process weight rate of 2177 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The fabric filter shall be in operation at all times the shotblaster is in operation in order to comply with this limit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) - Hammermill

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the hammermill shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2500 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The fabric filter shall be in operation at all times the hammermill is in operation in order to comply with this limit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) - Welding Operations

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the welding operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The insignificant welding operations are exempt from 326 6-3 because the rod usage is less than 625 pounds of rod per day. However, these operations are still subject to 40 CFR Part 52, Subpart as covered under C.1 of the Part 70 permit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) - Grinding Operations

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is covered under C.1 of the Part 70 permit.

326 IAC 8 Rules

There are no Article 8 rules applicable to the General Fabrication, Fifth Wheel, Dry Freight Undercoat, Dry Freight Bogie, Reefer Undercoat, Reefer Bogie and Paint Spray Booths because they were constructed prior to January 1, 1980, and are not located in Clark, Floyd, Lake, Marion, Porter, Elkhart or St. Joseph County.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators of the Large Order Line (LOL) Bogie and Undercoat Booths, the MPL Undercoat/Bogie Booth, and the Duratemp Spray Booth

shall be limited to the following when coating miscellaneous metal:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	4.3
Air Dried Coat	3.5

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The requirements of 326 IAC 8-3 do not apply to the conveyorized degreaser/cleaner because it was constructed prior to January 1, 1980 and was not located in Clark, Elkhart Floyd, Lake, Marion, Porter or St. Joseph County.

326 IAC 8-4-3 (Petroleum liquid storage facilities)

The storage tanks at Great Dane Trailers are not subject to the requirements of 326 IAC 8-4-3 (Petroleum liquid storage facilities) because the tanks each have a capacity of less than 39,000 gallons (and, additionally, Tanks T9-T14 were constructed prior to January 1, 1980 and located in Clay County).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

All of the paint booths at the source have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack(s) while the respective booth(s) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation,

Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this freight trailer manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T021-7731-00008**.